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3-15-90	4

## TSCA Inspection Report

Hubert Thompson 3615 St. Louis Ave. St. Louis, MO 63163 (314) - 832 - 8782

Date: March 15, 1990 Inspection No: 031590186601

Docket No: VII-90-T459

## Introduction:

This inspection was a "For Cause Follow-Up" to determine if Mr. Hubert Thompson complied with the Consent Agreement and Final Order which required proper disposal of PCB transformers at his warehouse at the location shown above.

## Summary of Observations:

- i) Five physical samples were taken from the facility to determine if further clean-up is required before closure of the site can begin. The samples were identified with Lab Activity Number SLA74.
- ii) One transformer was discovered at the site and identified as a Maloney 25 KVA transformer with Serial Number 704927. The transformer was inspected and found to be drained.
- iii) Two drums of PCB debris were stored at the above location, a sewer drain was observed within the same area. is also prone to rainwater from busted windows and skylights.

## History of Site:

Refer to Docket Number VII-89-T369 and Docket Number VII-87-T719 for history and past violations at the facility.

## Persons Interviewed and Individual Responsibilities:

Hubert Thompson --- Owner

## Inspection:

Arrangements were made with Mr. Hubert Thompson to arrange an inspection at the above location to determine if further cleaning would be required at the site. I met with Mr. Thompson on March 15, 1990 to obtain samples. I presented my credentials and had him read and sign the Notice of Inspection and the Confidentiality Notice, copies were than given.

> S00072980 SUPERFUND RECORDS

I than asked Mr. Thompson if I could review the records he had in regards to the disposal of the material generated from his clean-up? He replied, the records were with his attorney and he would send copies of the records to EPA for review.

I than asked to inspect the area where the PCB transformers had been removed. We proceeded to the site where the concrete pad had been removed. The transformers located on this pad were manufactured by Maloney and showed contamination levels between 645,000 ppm to 772,000 ppm, refer to App. I and App. II. An inspection by Mr. Krager with the Missouri Department of Natural Resources on February 24, 1989 revealed samples taken from the site at contamination levels of 1200 ppm. There was no power in the building and flashlights were used to inspect the building.

The excavated area was about a 4 inch deep by eight foot wide by ten foot long area. The pit contained solid portions of concrete as well as removal area's to the soil. Outside the excavated area stains and dirt were prevalent, Mr. Thompson attributed this to water-run off from outside. Refer to Photographs 1-3. The flags within the area were sample points taken by U.S. Pollution Control Inc., I than asked Mr. Thompson if he could send me the results of these samples as well. Also located adjacent to the excavated were two drums containing clean-up from the site. These drums were properly labeled and marked. Mr. Thompson also identified the entrances to the clean-up area with PCB labels. I did not observe any water standing in this area of the building but Mr. Thompson stated that water can reach that area due to broken skylights, and windows.

I than proceeded to take samples from within the excavated area as well as the exterior bounds, the samples are as follows:

Sample No:	Type	Descript	Photo
SLA74-001F	Control	8oz Jar	
SLA74-002	Soil	NW Corner(Excav. Area)	4
SLA74-003	Soil	NE Corner(Excav. Area)	5
SLA74-004	Soil	SW Corner(Excav. Area)	6
SLA74-005F	Wipe	Control	
SLA74-006	Wipe	NE Corner(Exterior Surf)	7
SLA74-007	Wipe	West Side(Drain)	N.A.

(Splits were provided to Mr. Thompson)

Note: (Outlines of the Drain can be seen in Photographs 8-10, if enlarged details of the drain can be seen. Refer to App. III for a map of the sampled area.)

During the sampling of the area, I discovered a 25 KVA Maloney transformer in the far NW corner of the building. The

transformer was identified with the Serial Number 704927. transformer was located about two feet from the drain. Thompson said, he was never aware of the transformer being there, he said most probably the contractors identified it as Non-PCB or a dry type transformer since it was not removed with the other transformers. The transformer was cylindrical in shape and was about five feet tall by two feet wide. The transformer did not contain a spigot at the bottom or any indication on the nameplate that it was oil-filled. The transformer was also still hooked up to the breaker box. The transformer did appear to have stains on the exterior, refer to Photographs 8-11. At this time, I removed the lid and inspected the interior of the transformer, I did not observe any residual oil at the bottom of the unit. At this time Mr. Thompson, stated that it must be a dry type transformer since no oil was discovered. I informed Mr. Thompson that I was no electrical expert but I still believed that the unit at one time may have contained oil. Mr. Thompson said he may remove the unit anyway, I informed him since the unit is dry it can be sent to a chemical waste landfill for disposal.

Note: (All during the course of the inspection Mr. Thompson was stating his inability to pay and if Uncle Sam wanted this building they can have it.)

## Closing:

We than prepared to close the inspection, Mr. Thompson read and signed the Receipt for Samples and Documents, Declaration of CBI, and the Summary of Observations. Copies were than given to him and I departed the facility.

I returned to the office and reviewed the TSCA inspection report from 1987, refer to Docket Number VII-87-T719. The transformers removed from the clean-up site were also Maloney's, their serial numbers were from 702029 to 702032, all these units were Askarel. The serial number from the Maloney transformer discovered during this inspection was 704927, this unit was manufactured at a later date but most probably will be similar to the earlier units in design.

James Hirtz

Environmental Engineer

March 21, 1990

Appendages: Notice of Inspection

Receipt for Samples and Documents

MARCH 21 1820

Summary of Observations Confidentiality Notice Declaration of CBI Transformer Location Transformer Analysis Sample Location Photographs FTTS



## US ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

## NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION 2. TIME 3. FIRM NAME INSPECTOR NO. DAILY SEQ. NO. 4. INSPECTOR ADDRESS 5. FIRM ADDRESS テス6 MINNESCTA KC, KS 66101 **REASON FOR INSPECTION** Under the authority of Section 11 of the Toxic Substances Control Act: For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with. In addition, this inspection extends to (Check appropriate blocks): A. Financial data D. Personnel data ☐ E. Research data ☐ B. Sales data C. Pricing data The nature and extent of inspection of such data specified in A through E above is as follows: RECIPIENT SIGNATURE INSPECTOR SIGNATURE

# SEPA

## IS ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS.

Form Approved OMB No. 2070-0007 Approval expires 8-31-85

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	NVESTIGATION IDENT		2. FIRM NAME
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3. INSPECTOR ADDR	ESS		4. FIRM ADDRESS
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	" " MANES	74.C	2810 N. Spring / 3615 54.220.5 AU
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			63163
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<b>i</b>	s and samples of chem and enforcement of t		mixtures described below were collected in connection with the control Act.
	DECEIPT OF THE C	OCUMENT(S) AND (OR	SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:
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		005	(Soil) NE Corner
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### • ENVIRONMENTAL PROTECTION AGE TSCA INSPECTION SUMMARY OF OBSERVATIONS

Name and Address of Inspector(s)	Name and Address of Facility	
James HIRTZ	Hubert Thompson   2300 NO Spring / 3615 St. 200,5 AVE	
Environmental Protection Agency  Toxics and Pesticides Branch	63163	
726 Minnesota Avenue	Chief Executive Officer of Firm	
Kansas City, Kansas 66101	1 Hubert Thompsin	
Name of Individual to Whom Notice Given	Title	
Hubert Thompson	CONER	
Title	Address	
OWNER 3/15/90	 	

The following possible deviations from the requirements of the Toxic Substances Control Act and regulations promulgated thereto were observed during this inspection:

5 Physical Samples
taken and identified
with Activity # SLA74.

This Summary of Observations is provided to bring to your attention those areas of concern at the earliest possible time. It is not intended to be a complete list of deviations from the requirements of the Toxic Substances Control Act and regulations thereto, but rather a list of those conditions of immediate concern and/or those readily apparent. If you have any questions regarding this summary, please contact the Toxics and Pesticides Branch at 913/236-2838.

The undersigned acknowledges having received and read a copy of this TSCA Summary of

Observations.		
Huch Phonoso	DWNEr	3-15-90
Signature	Title	Date
AC. TO	Four Fich	3/15/90
Signature of Inspector	Title of Inspector	Daté
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Distribution: White - Regional Office Copy

Yellow- Facility Copy
Pink - Inspector's Copy



## S ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

	NFIDENTIALITY NOTICE
1. INVESTIGATION IDENTIFICATION	2. FIRM NAME
ATE INSPECTOR NO. DAILY SEQ. NO.	
3/15/90 1544 01	Hubert Thomasin
INSPECTOR NAME	4. FIRM ADDRESS
James Hirtz	2810 N. Spring / 3613 St. 1925 HV.
INSPECTOR ADDRESS	St. Lauis, Mo
726 MINNESCHE	63163
her ye	6. CHIEF EXECUTIVE OFFICER NAME
KC, KS	H-2000-+
66101	7. TITLE
	CUNER
TO ASSERT A CONFIDENTIAL	BUSINESS INFORMATION CLAIM
It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Pert 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.  Any or all the information collected by EPA during the inspection may	<ol> <li>The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).</li> <li>The information is not publicly available elsewhere.</li> <li>Disclosure of the information would cause substantial harm to your company's competitive position.</li> <li>At the completion of the inspection, you will be given a receipt for all</li> </ol>
be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.  A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.	documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.  If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.  The statement from the Chief Executive Officer should be addressed to:
<ul> <li>While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:</li> <li>Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.</li> </ul>	and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.
BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE  I have received and read the notice	business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information,
<i>*</i>	please designate below.
GNATURE PLANTED	NAME
HIRITACINFSON	TITLE
TLE DATE SIGNED 5-15-PC	ADDRESS



### S ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

### TOXIC SUBSTANCES CONTROL ACT

Form Approved OMB No. 2070-0007 Approval expires 3-31-85

***************************************	1. INVESTIGATION IDENTI		ENTIAL BUSINESS INFORMATION 12. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	
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3/15/97	DORESS	<del></del>	4. FIRM ADDRESS
726	minnesita		2710 N Spring /3615 St. 20015 Ave
<b>汉じ、</b>	KS beloi		54. 20015, MO 63163
	INFORMA	ATION DESIGNATED AS	S CONFIDENTIAL BUSINESS INFORMATION
NO.			DESCRIPTION

### **ACKNOWLEDGEMENT BY CLAIMANT**

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

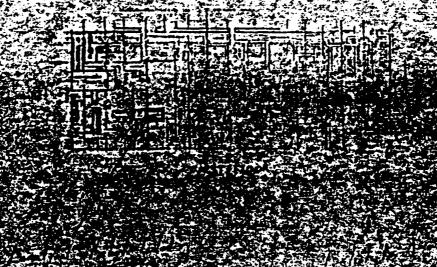
The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

' ECTOR SIGNATURE		CLAIMANT SIGNATURE	
Scina	JS.	Much Ham	
NAME James	Hirly	H. R. Thomps	CN
TITLE	DATE SIGNED	CIUNEL	DATE SIGNED

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Southwest	702031	1-3/52425
Middle west	702032	1-2/52374





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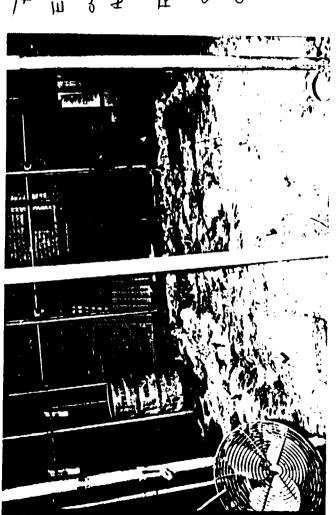
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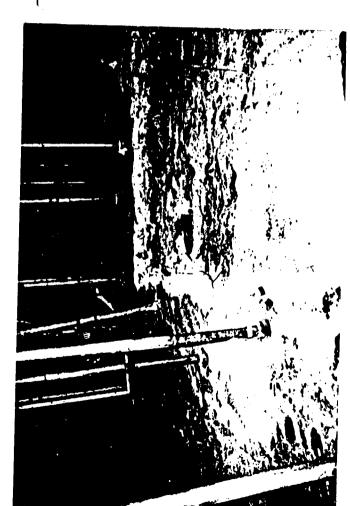
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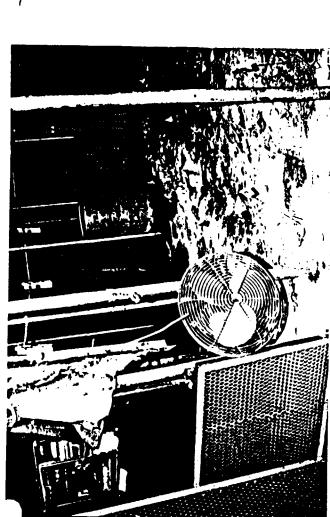


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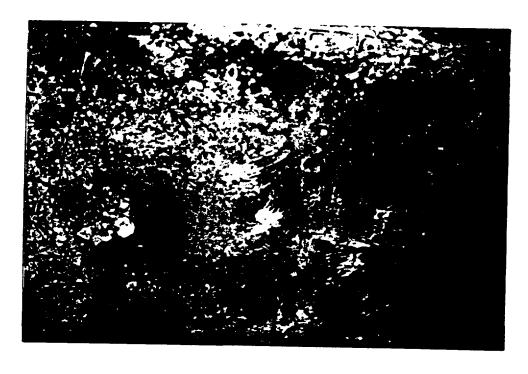
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Additional



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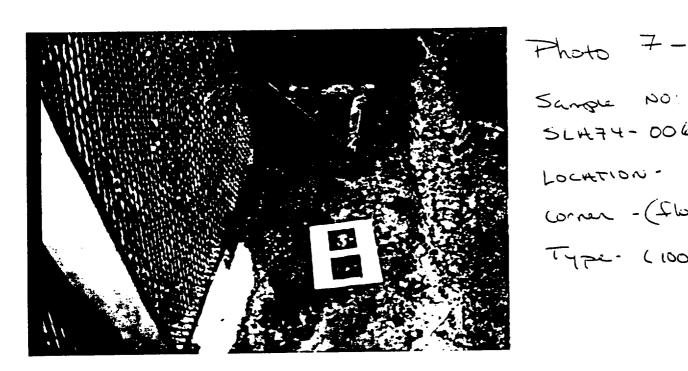
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Sangle NO: SLH74-006 LOCATION - NE (now)- remov Type- (100cm2 wipe)

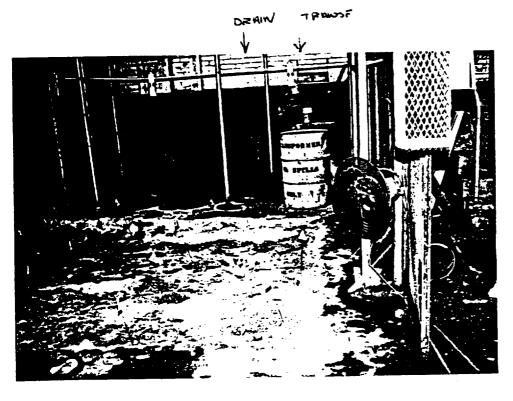
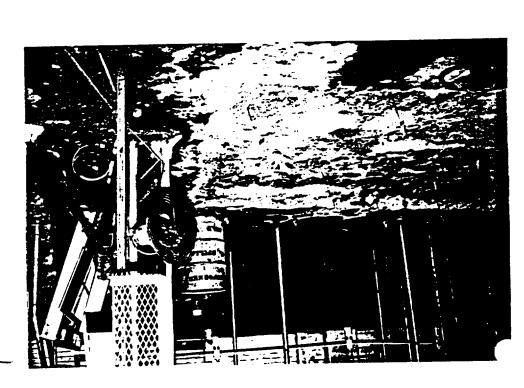
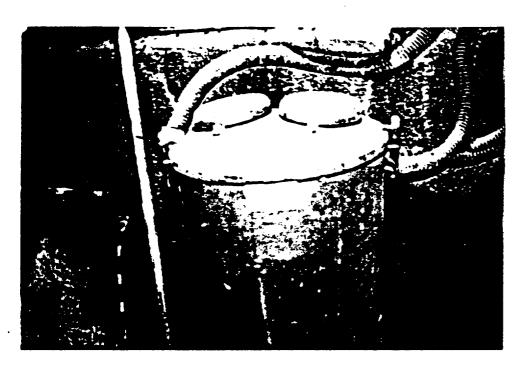


Photo 8maiony Transf. discovered approximate 2 year from floor drain, Seriel # - 704927

-01 stord Additions Photo 25 Transf.



Additioned Photo



Thate II.

Close-up of

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Transform

Transform

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### FTTS INSPECTIONS

•INSPECTION DATE: 03/15/90	*INSPECTOR NUM: 1866	*INSPECTION SEQ: 01
*LEGISLATION IND: Tor P	*INSPECTION TYPE: 6PF	•
*REGION/STATE: VII	INSPECTOR NAME: James	HIRTZ
• REASON FOR INSPECTION: FCF	REFERRAL TYPE:	*NUMBER OF SAMPLES: OF
DATE RPT RECD://_	WARRANT REQUIRED: Y OF N	FED FACILITY: Y or N
CBI: Y or CP	NUMBER SCHOOLS:	SCHOOL TYPE:
*FACILITY FUNCTION: US	EPA ESTAB:	
REMARKS: DOLKET	VII - 90-T-459	·
*SITE NAME: Hulaet	Thanger	
*SITE ADDR: 3015	~	
*SITE CITY: 51 U		
*SITE STATE: min		
SITE DUNS:		
SITE SIC CODES:		
*PARENT CO NAME:		
*PARENT CO ADDR:		
*PARENT CO CITY:		
*PARENT CO CITY: *PARENT CO STATE: **I	PARENT CO ELP:	

INSPECTOR'S SIGNATURE

3/19/90 DATE

## FTTS SAMPLES

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*INSPECTION SEQ: O\ *SAMPLE SEQ: O	DATE SAMPLE COLLECTED: 3/15/90
LAB NAME: SLA 74-001 F	
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DATE SAMPLE SENT/DELIVERED: 3/2/90	DATE RESULTS RECD: _/_/_
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SLH74-00 \	
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DATE SAMPLE SENT/DELITERED: 3 /20/90	DATE RESTLES RECO:/_/_
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### FTTS SAMPLES

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DATE SAMPLE SENT/DELIVERED: 3/20 DATE RESULTS RECU: _/_/_
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SLA 74-004
SAMPLE MEDIUM: 901 F
DATE SAMPLE SENT/DELIVERED: 3/20/90 DATE RESILES RECD:_/_/_
PRODUCER NAME/COLLECTION LOCATION:
PRODUCT NAME: REG NO:
AMOUNT: 5 0 t 100 ±:
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SAMPLE DELIVERED TO:

### FTTS SAMPLES

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*SAMPLE SEQ NUMBER: O7	
LAB NAME: 5, 474-007	
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DATE SAMPLE SENT: 3/22/70	DATE RESULTS RECD://_
REMARKS: 100 LD Wige. (W.	Side by Drain)
	_
*SAMPLE SEQ NUMBER: 0 8	
*SAMPLE SEQ NUMBER: 08  LAB NAME: 03/590/9660/-0/	
LAB NAME: 031590186601-01	